

Privacy Policy

This privacy policy sets out how Pension Charter (“the Site”) uses and protects any information that you disclose or is collected when you use this website. We are a “Data Controller” for the purposes of the current Data Protection Act 1998 and we will remain so under the General Data Protection Regulation ((EU) 2016/679) (“GDPR”) and the legislation replacing the 1998 Act whilst undertaking our business services. This Privacy Policy applies to all of the products, services and websites offered by the Company or its subsidiaries or affiliated companies. Sometimes we may post product-specific privacy notices to explain our products in more detail. If you have any questions about this Privacy Policy, please feel free to contact us through our website. We are committed to ensuring that your privacy is protected. This Privacy Policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully as it contains important information on our practices regarding your personal information and how we, as a data controller, will treat personal information you provide to us through the Site, including the information we collect, what we do with the information you provide to us and who we may share your information with. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

DATA PROTECTION PRINCIPLES We will comply with data protection law and principles, which means that your information will be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

WHAT WE COLLECT We may collect the following types of information:

- Personal details such as name, telephone number and address/location;
- Your requirement for an IFA or a restricted adviser; and
- Information such as your web request, your interaction with a service, Internet Protocol address, browser type, browser language, the date and time of your request.

HOW IS INFORMATION COLLECTED? We collect your personal information through different methods including:

- Directly from yourselves when you sign up for an account and through communications with us;
- Cookies;
- Log information;
- Affiliated services on other sites;
- Third party applications such as widgets or add-ins; and
- Location data from Location Finders and Mapping applications.

FOR WHAT USE We will only use your personal information when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal information other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to such marketing at any time.

FOR WHAT PURPOSE We need all the categories of information in the list above (see what we collect we collect section above) primarily to allow us to perform our contract with you and to enable us to comply with our legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

- To register you as a client;
- To process enquiries and respond to requests;
- To communicate with you;
- To operate and improve the Site and help make your

experience better; • To perform our service; • To manage our relationship with you, including notifying you about changes to our contract or services or asking you to provide us with feedback; • To administer and protect the business and this website; • To follow up the referral with a survey assessing the service you have received from the IFA and or restricted adviser you have been referred to; • To improve the quality of our services; • We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided; and • From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests. If you fail to provide personal information If you fail to provide certain information when requested either by law, or under the terms of a contract we have with you, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time. Change of purpose We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

WHAT WE DO WITH THE INFORMATION WE GATHER We only share personal information with other companies or individuals in the following limited circumstances: • Where we have your consent. We require opt-in consent for the sharing of any sensitive personal information; • We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. • Any third parties will be bound by contractual provisions with us and only have access to personal data to perform the described purposes, and may not use it for other purposes. Further, they must process the personal data in accordance with this Privacy Policy and as permitted by the GDPR, the Data Protection Act 1998 and subsequently the Data Protection Act 2018 (subject to royal assent), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and the E-Privacy Regulations when it comes into effect. • Making an introduction or referral to an IFA and or Restricted Pension Specialist that you have requested • We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent or otherwise address fraud, security or technical issues, or (d) protect against harm to the rights, property or safety of the Company its users or the public, as required or permitted by law. **SECURITY** We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.